

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

AVR GROUP, LLC, TRIDENT ASSET)	
MANAGEMENT, INC., MICHAEL)	
DZIURGOT, individually and as the)	
representatives of a class of similarly-)	
situated persons,)	Civil Action No.: 1:24-cv-20755-DSL-JG
)	
Plaintiff,)	
)	
v.)	
)	
ALEBRIJE ENTERTAINMENT LLC,)	
CRAIG COLE, MATTHEW COLE,)	
GUSTAVO MONTAUDON, and John Does)	
1-10,)	
)	
Defendants.)	

**PLAINTIFFS' CERTIFICATE OF INTERESTED PARTIES AND
CORPORATE DISCLOSURE STATEMENT**

Plaintiffs, AVR GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC., MICHAEL
DZIURGOT, by and through undersigned counsel and pursuant to Federal Rule of Civil
Procedure 7.1, hereby file their Certificate of Interested Parties and Corporate Disclosure
Statement. Defendants respectfully state as follows:

Interested Parties

- A. AVR GROUP, LLC c/o
 LOFTUS & EISENBERG, LTD.
 161 Clark, Suite 1600
 Chicago, Illinois 60601
 Plaintiff

- B. TRIDENT ASSET MANAGEMENT, INC. c/o
 LOFTUS & EISENBERG, LTD.
 162 Clark, Suite 1600
 Chicago, Illinois 60601
 Plaintiff

- C. MICHAEL DZIURGOT c/o
 LOFTUS & EISENBERG, LTD.

163 Clark, Suite 1600
Chicago, Illinois 60601
Plaintiff

D. LOFTUS & EISENBERG, LTD. c/o
161 N. Clark, Suite 1600
Chicago, Illinois 60601
Counsel for Plaintiffs

E. Joseph McNulty c/o
LOFTUS & EISENBERG, LTD.
164 Clark, Suite 1600
Chicago, Illinois 60601
Owner of AVR GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC

F. ALEBRIJE ENTERTAINMENT LLC c/o
Law Office of Adam I. Skolnik, P.A.
1761 West Hillsboro Blvd., Suite 207
Deerfield Beach, FL 33442
Defendant

G. GUSTAVO MONTAUDON c/o
Law Office of Adam I. Skolnik, P.A.
1761 West Hillsboro Blvd., Suite 207
Deerfield Beach, FL 33442
Defendant

H. CRAIG COLE c/o
Stumphauzer Kolaya Nadler & Sloman
2 South Biscayne Blvd, Suite 1600
Miami, FL 33131
Defendant

I. MATTHEW COLE c/o
Stearns Weaver Miller Weissler
Alhadeff & Sitterson, P.A.
150 West Flagler St., Suite 2200
Miami, FL 33130
Defendant

Corporate Disclosure

AVR GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC are each privately held in Nevada and California respectively by Joseph McNulty. No publicly held company

owns ten percent (10%) or more shares of either AVR GROUP, LLC. or TRIDENT ASSET MANAGEMENT, INC.

Respectfully submitted,

/s/ Ross M. Good

Ross M. Good – FL Bar No.: 116405

Ross Good, Esq.

Alexander N. Loftus, Esq. (Pro Hac Vice)

LOFTUS & EISENBERG, LTD.

161 N. Clark, Suite 1600

Chicago, Illinois 60601

Telephone: (312) 772-5396

Direct: (786) 539-3952

ross@loftusandeisenberg.com

alex@loftusandeisenberg.com

Attorneys for Plaintiffs

DATE: May 22, 2024

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 22, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Ross M. Good

Ross M. Good – FL Bar No.: 116405

Ross Good, Esq.

Alexander N. Loftus, Esq. (Pro Hac Vice)

LOFTUS & EISENBERG, LTD.

161 N. Clark, Suite 1600

Chicago, Illinois 60601

Telephone: (312) 772-5396

Direct: (786) 539-3952

ross@loftusandeisenberg.com

alex@loftusandeisenberg.com

Attorneys for Plaintiffs